Montana
Office of Public Instruction
Denise Juneau, State Superintendent

opi.mt.gov

Office of Public Instruction
P.O. Box 202501
Helena, MT, 59620-2501
(406) 444-3095
(888) 231-9393
(406) 444-0169 (TTY)
opi.mt.gov

Date: September 2012

To: School Food Authority Administrators

From: Christine Emerson, Director
School Nutrition Programs

Re: **Instructions for Verification:** LEAs with **greater than 80%** household response rate in the previous school year

Verification is the process by which Local Educational Agencies (LEAs) confirm the eligibility of a sample of approved applications for free and reduced-price school meals.

Congratulations! Your district had greater than 80 percent household response rate from household applications verified last school year. This means that you may choose the random sampling verification method. A copy of last year's Summary of Verification form has been included for your reference.

The verification process must be completed by November 15. **Please note the earlier submission deadline this year. You must submit the Summary of Verification form to this office by November 15.** *Late submissions beyond the November 15 deadline will require a written request for an extension to OPI, School Nutrition Programs.* A Verification Deadline Extension Request Form is available on our website. OPI may approve, in writing, an extension up to December 15 of the current school year due to natural disaster, civil disorder, strike or other circumstances that prevent the district from the timely completion of verification activities. *A request for an extension beyond December 15 must be submitted by OPI to the USDA for approval.*

It is recommended that you separate applications based on the categories listed on the Summary of Verification form (1a through 2) or ensure that your software system is capable of counting the number of students and applications in each category accurately.

The following prototype letters are available at http://www.opi.mt.gov/schoolfood/index.html and are required to successfully complete the verification process.

- Notification of Selection for Verification *(We Must Check Your Application)*
- Notification of Verification Results *(We Have Checked Your Application)*

Verification does **not** apply to:
- Residential Child Care Institutions, except for those with applications for attending day students;
- Schools in non-base years using Special Provisions 2;
- Households whose determinations are Directly Certified as eligible for free meals using SNAP reports;
- Homeless, migrant and/or runaway students identified by the LEAs homeless liaison; and
- Non-applicants approved by local officials (administrative applications).

Please review the attached instructions, definitions and tips for detailed verification information. For additional information, use the USDA's *Eligibility Guidance for School Meals Manual*: http://www.fns.usda.gov/cnd/guidance/EliMan.pdf (starting on page 63) or contact Alie Wolf, School Nutrition Programs Administrative Assistant at (406) 444-4413.

The Montana Office of Public Instruction provides vision, advocacy, support, and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's opportunities.

Instructions for Verification Activities
(Random or Focused Methods)

Beginning of School Year to October 1
Collect and approve applications for free and reduced-price meals.

October 1 to November 15
Count the number of **applications and students** approved for free and reduced-price meals as of **October 1**. Complete items 1 through 3 on the Summary of Verification form. *Directly certified, homeless and administrative students are not subject to verification, but the number of students must be included on the Summary of Verification.*

1. Type of Verification Sampling & Calculation: choose either the Random or Focused sampling methods and calculate the number of applications to verify. See the attached "Type of Verification Sampling Methods" instructions for further details. Random sampling is the most common type. (Refer to the Type of Verification Sampling section of the Summary of Verification form to calculate)

2. Draw the required number of applications according to your Type of Verification Sampling calculation. **With the random method, do not verify less than or more than 3 percent. Round all decimals up to whole numbers.** *For instance 3.1 should be rounded up to 4.*

3. Once the applications have been drawn for verification, a "preliminary review" must be conducted. A person other than the determining official must check the applications pulled for verification to ensure that they were determined correctly before the verification process can proceed. For record keeping purposes you may use the Verification Activity Tracker form for each application drawn for verification. You may also use the "confirming official" signature line on the free and reduced-price application to document the preliminary review.

4. Send the prototype Notification of Selection for Verification letters to the selected households. This letter is available at http://www.opi.mt.gov/schoolfood/index.html.

   - The household should have ten working days to submit income documentation.
   - The household may provide proof that the child is a member of a household receiving assistance under the SNAP (Food Stamp Program), TANF, FDPIR or foster care instead of providing income information.
   - The household must be provided with a name of the person at the district who can answer questions and provide assistance and a no-cost telephone number.
   - If a household does not respond, you must follow-up with that household at least once before that household is deemed non-responsive and meal benefits are ceased.
   - If a household selected for verification transfers out of the district before the information can be verified, a new application must be selected for verification.

5. Once responses have been received or determined unresponsive, re-determine the household's benefits and send the prototype Notice of Verification Results letter to households. This letter is available at http://www.opi.mt.gov/schoolfood/index.html. *All households for whom benefits are to be reduced or terminated must be given 10 calendar days written advance notice of the change.*

6. Report the verification results on the Summary of Verification under the "Household Results" section.

Earlier Deadline - November 15
All verification activity must be completed by **November 15** (steps 1 through 6 above). Keep copies of original applications, letters to households and activity tracker forms on file at the district. **Send the Completed Summary of Verification form to OPI School Nutrition Programs by November 15** by faxing to 406-444-2955 or mail to PO Box 202501, Helena, MT, 59620.

Late submissions beyond the November 15 deadline will require a written request for an extension to OPI, School Nutrition Programs. A Verification Deadline Extension Request Form is available on our website. OPI may approve, in writing, an extension up to December 15 of the current school year due to natural disaster, civil disorder, strike or other circumstances that prevent the district from the timely completion of verification activities. *A request for an extension beyond December 15 must be submitted by OPI to the USDA for approval.*

Type of Verification Sampling Methods

LEAs with ***greater than 80%*** *response rate during the previous year may use **random** or **focused** sampling. Please reference these instructions to the Summary of Verification form to calculate. It is important to have all applications and students in each category accurately counted (items 1 through 3) before the sampling method can be calculated. Contact our office for any questions on these categories.*

Random Sample
This method requires verification of 3 percent of approved **applications** on file as of October 1.

1. Determine the sample size of 3 percent of all approved **applications** on file as of October 1 eligible for verification (item 3 x .03 = the number of applications that need verified. *Include all applications except directly certified, homeless and administrative listed in 1a*).
     - **Round all fractions up** to whole numbers (ex: 73 applications x .03 = 2.16; you must verify 3 applications). ***At least one application must be verified.***
2. Draw a random sample from among these applications. Ways to take a random sample:
     - Use a selection interval. Divide the total number of approved applications by the sample size to determine the selection interval. For example, if you have 160 applications and 5 is the sample size, divide 160 by 5 = 32. Pull every 32nd approved application until 5 applications are selected.
     - Ask someone in the office to randomly draw the required number of applications.
3. Continue to step 3 on previous page.

Focused Sample
This method requires verification of 1 percent of total approved applications on file as of October 1 *selected* from approved error-prone households (1c and 2) **plus** 0.5 percent of applications approved based on SNAP (Food Stamp), FDPIR or TANF case numbers (1b). *This method is suitable for larger school districts.*

1. Take the 1 percent portion of the sample:
     - *Calculate* the sample size of 1 percent from ALL approved applications on file as of October 1 (item 3 x .01 = the number of error-prone applications that need verified. *Include all applications except directly certified, homeless and administrative listed in 1a*). Round all fractions up to whole numbers.
     - *Draw* the sample from only the error-prone applications.
          - If there are more applications that meet the criteria than needed, select a random sample from those applications.
          - If there are not enough applications that meet the criteria, select applications that are closest to the income eligibility guidelines.
          - At least one income application must be verified if there are any such applications on file.
2. Take the 0.5 percent portion of the sample:
     - *Calculate* the sample size of one-half of one percent from the total number of applications approved based on SNAP (Food Stamp), FDPIR, or TANF case number on file as of October 1 (1b. x 0.5= number of case number applications to verify). Round all fractions up to whole numbers.
     - *Draw* the sample from the case number applications (1b) using any method that is equitable and ensures that the same household is not selected each year.
          - At least one SNAP (Food Stamp), FDPIR or TANF application must be verified if there are any such applications on file.
3. Add the number of applications in the 1 percent sample to the number of applications from the 0.5 percent sample. This is your total number of applications to be verified.
4. Continue to step 3 on previous page.

Verification Definitions & Tips
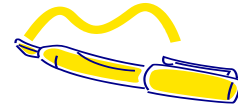
Did Not Respond

Non-response rate is defined as the percentage of approved household applications selected for verification for which verification information was not obtained by the LEA. This definition is used to determine if a follow-up contact is required and to report the non-response rate on the Summary of Verification Report.

The following are considered non-responses:
- ✓ The household does not contact the LEA when the initial request for verification is sent or when the LEA attempts follow-up;
- ✓ The household responds to the initial request but provides incomplete information and the LEA is unable to determine if the eligibility determination was correct; or
- ✓ The household responds to the initial request but fails to provide the LEA with documents or is otherwise unable to provide appropriate documentation.

Any of these outcomes must be reported as "Did Not Respond" in line 8 on the Summary of Verification Report. ***School districts are strongly encouraged to be thorough when following up to get 100 percent response rate during the verification process. Districts with less than 80 percent response rate will be required to conduct the error prone method of verification the following school year.***

Qualify for Reduced Verification Requirements

School districts qualify for reduced verification requirements (i.e., qualify for the random sampling method) during the subsequent year if it achieves a response rate (from households drawn for the verification process) of 80 percent or higher during the current year's verification activities. LEA's that do not obtain an 80 percent or higher response rate are required to conduct the error prone sampling method the following school year. For instance if the school verifies two applications and one is determined as nonresponsive, the LEA would have a 50 percent response rate and be required to conduct the error prone verification sampling method the following school year.

Error-Prone Applications

Application income reported within $100 per month or $1,200 per year of the Income Eligibility Guidelines.

Categorically Eligible

Students eligible for free benefits due to a member of household receiving assistance from the SNAP (Food Stamp Program), Food Distribution Program on Indian Reservations (FDPIR) or Temporary Assistance for Needy Families (TANF) and reporting the case number on the free and reduced-price application or have submitted the Department of Health & Human Services SNAP letter. Foster Children are also Categorically Eligible. Students that are approved as Categorically Eligible were not located on the SNAP report.

Update: Recent USDA policy changed the determination of SNAP letters as no longer being a source of direct certification and should now be counted as Categorically Eligible. If the students listed on the SNAP letter are found on the SNAP report then you may count them as Directly Certified or use as a source of Direct Verification.

Directly Certified

Students eligible for free benefits based on documentation obtained directly from the appropriate State or local agency authorized to certify that the children are members of a SNAP (Food Stamp), FDPIR or TANF household, without further application. Eligibility is extended to all children in a household if one member has been directly certified under the Assistance Programs. The majority of those directly certified will be your students determined as eligible for free school meals using data from SNAP reports. Foster Children can be counted as Directly Certified if the household submitted court documentation with the f/r application. Direct Certification determination supersedes all other eligible categories. The more students that your district Directly Certifies, the fewer applications in your calculation pool that are subject verification, therefore, the less applications that need to be verified.

Direct Verification

Obtaining verification documentation directly from the appropriate State or local agency for categorically eligible students.

Verification for Cause

The LEA has an obligation to verify all questionable applications (for cause). However, verification that is done "for cause" is **in addition to** and **should not be included** in the sample required for the formal verification process.